

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL 23 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DENISE HUNTER,

Defendant.

No.

4:15CR342 JAR/NCC

INDICTMENT

COUNT I

(FALSE STATEMENT)

18 U.S.C. § 1001(a)(2)

1. On or about March 28, 2006, within the Eastern District of Missouri, **DENISE HUNTER** (defendant) purchased a house at 1309 Tucker, St. Louis, Missouri 63104 (In documents relevant to this indictment, among other designations, this address is also known as 1309 South 13th Street, St. Louis, Missouri 63104, 1309 Tucker Lot 14, and 1309 South Tucker, St. Louis, Missouri 63106. It will be referred to hereinafter as the "Tucker Residence.")

2. Defendant purchased the Tucker Residence using the Hope VI Loan assistance program, a program designed to assist in the purchase of primary housing. This program is offered through the St. Louis Housing Authority (SLHA) and funded by a federal agency – the United States Department of Housing and Urban Development (HUD).

3. On or about August 1, 2008, defendant completed an application under the "Housing Choice Voucher Program" ("Section 8" or "the Section 8 Program,") which requires

the federal government to pay all, or a portion of, defendant's rent. On the application, defendant falsely stated that she did not own real estate; when she completed the application, defendant owned the Tucker Residence that she purchased through the Hope VI Loan assistance program.

4. In or about August 2008, defendant was approved for the Section 8 Program and entered into leases at the following locations in the Eastern District of Missouri where Section 8 benefits were paid for defendant's rent:

a. 1712 El Sabado, St. Louis, Missouri 63138 from about November 2008 to about November 2011;

b. 1000 Washington Avenue, St. Louis, Missouri 63104 from about November 2011 to about July 2013.

5. From about November 2008 through about July 2013, approximately \$34,287 was paid for rental properties on behalf of defendant through the Section 8 program.

6. On or about August 3, 2010, in the Eastern District of Missouri, defendant completed, signed and submitted to the SLHA a Section 8 Recertification Application.

7. When defendant completed the Section 8 Recertification Application, defendant owned the Tucker Residence.

8. In the Section 8 Recertification Application that defendant completed on or about August 3, 2010, defendant made material false statements to wit: defendant falsely stated that she did not own any real estate, when in fact she knew that was not true.

All in violation of Title 18 U.S.C. Section 1001(a)(2).

COUNT II
(FALSE STATEMENT)
18 U.S.C. § 1001(a)(1)

9. Paragraphs 1- 8 of Count I of this Indictment are re-alleged here.

10. In the Section 8 Recertification Application that defendant completed on or about August 3, 2010, defendant concealed material facts to wit: defendant concealed that her address was 1309 Tucker, St. Louis, Missouri 63104.

All in violation of Title 18 U.S.C. Section 1001(a)(1)

A TRUE BILL.

FOREPERSON

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